

STATE OF NEVADA

Department of Conservation & Natural Resources

DIVISION OF ENVIRONMENTAL PROTECTION

Brian Sandoval, Governor

Leo M. Drozdoff, P.E., Director

Colleen Cripps, Ph.D., Administrator

July 3, 2012

Gerardo Rios, Chief (A-5-1)
New Source Section
Air & Toxics Division
U.S. EPA, Region IX
75 Hawthorne Street
San Francisco, CA 94105

**Re: Proposed Minor Revision for Hawthorne Army Depot Main Base
Air Quality Operating Permit #AP9711-0863.02, FIN A0022**

Dear Mr. Rios:

Enclosed please find the **PROPOSED** pages for the Class I Air Quality Operating Permit AP9711-0863.02 minor revision and Director's Review for the HWAD facility located near Hawthorne, Nevada.

This minor revision proposes to:

1. Add System 47. A battery recycling process containing a mercury retort will be added to the permit. The retort will be located at the Naval Undersea Warfare Center Battery Recycling Facility (Building 104-5) and will be used to remove mercury from silver-zinc battery cells of Naval Undersea Warfare equipment. Only mercury emissions are associated with the retort battery recycling process. The mercury emissions from the retort process are conservatively estimated at 41.7 pounds per year.
2. Fix typographical errors for Systems 2-3-4-7-8-39-40-41-42-43-44-45 that were discovered in the recently renewed (December 2011) Title V air permit.
3. There are no emission changes to PM, PM₁₀, SO₂, NO_x, CO, or VOC's.

Pursuant to Nevada Administrative Code 445B.3425, this information is being provided to you to initiate EPA's 45-day review period. If you have any questions, please contact Randy Phillips at (775) 687-9362.

Sincerely,

Jeffrey Kinder, P.E.
Supervisor, Permitting Branch
Bureau of Air Pollution Control

JK/rp

Enclosures: Proposed Permit Pages and Director's Review

Certified Mail No. 9171-9690-0935-0009-9359-11

cc: Lt Colonel William C. Johnson, Hawthorne Army Depot, 1 South Maine Ave, Hawthorne, NV 89821-5000 (letter only)

cc: Omer Shalev, Environmental Engineer – U.S. EPA, region IX (e-copy; enclosures and application)



STATE OF NEVADA
DEPARTMENT OF CONSERVATION AND NATURAL RESOURCES
DIVISION OF ENVIRONMENTAL PROTECTION-BUREAU OF AIR POLLUTION CONTROL

**Director's Review and Preliminary Determination of Permit Issuance
for**

**Department of the Army – Hawthorne Army Depot
1 South Maine Avenue, Hawthorne, Nevada 89415-5000**

July 3, 2012

Hawthorne Army Depot (HWAD) submitted an application for a minor revision of their HWAD Main Base Title V Operating Permit AP9711-0863.02. HWAD is located in Mineral County, Nevada, approximately 1 mile north of Hawthorne, Nevada, U.S. Hwy 95 North. HWAD currently operates under a Title V Operating Permit (Main Base, AP9711-0863.02). HWAD currently holds a Title V Operating Permit (AP9711-0863.02), an Operating Permit to Construct for BEDS (AP9711-1489), an Operating Permit to Construct for RF-9 (AP9711-1445, which has been added to the Title V air permit), an Operating Permit to Construct for COMP A5 (AP9711-2757), and a Class II Air Quality Operating Permit for New Bomb (AP9711-1134.02).

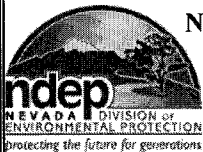
HWAD proposes to revise the HWAD Main Base Title V Operating Permit by adding a battery recycling retort system (System 47). The retort will be located at the Naval Undersea Warfare Center Battery Recycling Facility (Building 104-5) and will be used to remove mercury from silver-zinc battery cells of Naval Undersea Warfare equipment. Only mercury emissions are associated with the retort battery recycling process. The mercury emissions from the retort process are conservatively estimated at 41.7 pounds per year. Additional changes to the air permit include fixing typographical errors for Systems 2-3-4-7-8-39-40-41-42-43-44-45 that were discovered in the recently renewed (December 2011) Title V air permit.

The HWAD facility-wide potential-to-emit (PTE) is shown in the table below:

As proposed, HWAD will continue to be a Class I source. The potential-to-emit (PTE) of each regulated air pollutant is less than the 250 ton per year PSD threshold for major source designation. HWAD will be subject to NSPS 40 CFR Part 60 Subpart Dc and NESHAP 40 CFR Part 63 Subparts EEE, ZZZZ, CCCCCC, JJJJJJ.	HWAD Facility-Wide Potential to Emit	
	Pollutant	Tons/Year
	PM	Particulate Matter
	PM ₁₀	Particulate matter <10 microns in diameter
	NO _x	Oxides of Nitrogen
	CO	Carbon monoxide
	VOC	Volatile Organic Compounds
	SO ₂	Sulfur Dioxide
	Pb	Lead
	HAPs	Combined Hazardous Air Pollutants
		81.6
		78.1
		242.7
		23.6
		26.0
		83.5
		9.0
		24.9

The project is located in Air Quality Hydrographic Area (HA) 110C – Walker Lake Valley. HA 110C is currently unclassified for PM₁₀, NO_x, CO, SO₂, O₃, and lead criteria pollutants, which have an ambient air quality standard. The air quality analyses from the previous permit renewal action (December 2011) demonstrate that the emissions from the revised permit will not cause or contribute to a violation of any applicable federal or state ambient air quality standards.

The NBAPC has reviewed the application and has made a preliminary determination to issue the revised Main Base Title V Operating Permit. HWAD must comply with all State and Federal air quality requirements and all conditions established within the proposed Main Base Title V Operating Permit.



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

CLASS I AIR QUALITY OPERATING PERMIT
GENERAL REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Emission Unit List (continued)**AM. System 39 – 3.5 MMBtu/hr International Diesel Boiler**

S 2.056 3.5 MMBtu/hr International Diesel Boiler (ICEU-001), mdl# BF-100C-W1HL, s/n 637-E; Building 102-52

AN. System 40 – 3.5 MMBtu/hr Cleaver Brooks Diesel Boiler

S 2.057 3.5 MMBtu/hr Cleaver Brooks Diesel Boiler (ICEU-002), mdl# M4-6000, s/n 46018805; Building 104-2

AO. System 41 – 1.2 MMBtu/hr Cleaver Brooks Diesel Boiler

S 2.058 1.2 MMBtu/hr Cleaver Brooks Diesel Boiler (ICEU-004), mdl# OB-3, s/n 0-3619; Building 103-31

AP. System 42 – 1.2 MMBtu/hr Cleaver Brooks Diesel Boiler

S 2.059 1.2 MMBtu/hr Cleaver Brooks Diesel Boiler (ICEU-005), mdl# OB-3, s/n 0-3620; Building 103-31

AQ. System 43 – 2.5 MMBtu/hr Cleaver Brooks Diesel Boiler

S 2.060 2.5 MMBtu/hr Cleaver Brooks Diesel Boiler (ICEU-008), mdl# CBE100-060-150ST, s/n OL103313; Building 104-9

AR. System 44 – 3.8 MMBtu/hr Cleaver Brooks Diesel Boiler

S 2.061 3.8 MMBtu/hr Cleaver Brooks Diesel Boiler (ICEU-009), mdl# CBE100-090-150ST, s/n OL103314; Building 104-4

AS. System 45 – 3.4 MMBtu/hr Cleaver Brooks Diesel Boiler

S 2.062 3.4 MMBtu/hr Cleaver Brooks Diesel Boiler, s/n L99881; Building 49-31

AT. System 46 – Gasoline Storage Tanks

S 2.063 Gasoline Storage Tank (GT001, mfd by Elutron), 10,000 gallons, underground, Building #102-52

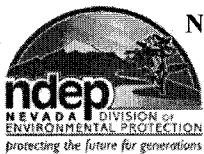
S 2.064 Gasoline Storage Tank (GT002, mfd by Elutron), 10,000 gallons, underground, Building #102-52

S 2.065 Gasoline Storage Tank (GT003, mfd by San Luis Tank and Piping Construction Co.), 1,000 gallons, above ground, Building #150

AU. System 47 – Battery Recycling Retort

S 2.066 Lochhead-Haggerty Mercury Retort, mdl# MR-15E, Building 104-5 (Battery Recycling Facility)

*****End of Emission Unit List*****



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

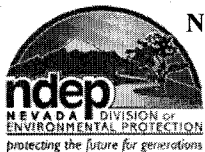
B. Emission Unit S2.002 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - d. 40 CFR Part 63 Subpart JJJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources

Permittee must comply with the following applicable requirements for S2.002 (an existing industrial boiler at an area source of HAP emissions):

 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) S2.002 will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (b) S2.002 will achieve compliance with the energy assessment requirement no later than March 21, 2014.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of S2.002 biennially as specified in 40 CFR 63.11223.
 - (b) Conduct a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include:
 - (i) A visual inspection of the boiler system;
 - (ii) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (iii) Inventory of major systems consuming energy from S2.002;
 - (iv) A review of available architectural/engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - (v) A list of major energy conservation measures;
 - (vi) A list of the energy savings potential of the energy conservation measures identified;
 - (vii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain S2.002 in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to B.4.d(1) of this section).
 - (b) Permittee must conduct a performance tune-up for S2.002 according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of S2.002 was completed.
 - (c) Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of S2.002 and its energy use systems was completed and submit upon request, the energy assessment report.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for S2.002 according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to B.4.d(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
 5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program

No shield requested.



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

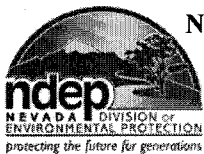
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

C. Emission Unit S2.003 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - d. 40 CFR Part 63 Subpart JJJJJ - NESHA for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for S2.003 (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) S2.003 will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (b) S2.003 will achieve compliance with the energy assessment requirement no later than March 21, 2014.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of S2.003 biennially as specified in 40 CFR 63.11223.
 - (b) Conduct a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include:
 - (i) A visual inspection of the boiler system;
 - (ii) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (iii) Inventory of major systems consuming energy from S2.003;
 - (iv) A review of available architectural/engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - (v) A list of major energy conservation measures;
 - (vi) A list of the energy savings potential of the energy conservation measures identified;
 - (vii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain S2.003 in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to C.4.d(1) of this section).
 - (b) Permittee must conduct a performance tune-up for S2.003 according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of S2.003 was completed.
 - (c) Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of S2.003 and its energy use systems was completed and submit upon request, the energy assessment report.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for S2.003 according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to C.4.d(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).- 5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

D. Emission Unit S2.004 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - d. 40 CFR Part 63 Subpart JJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for S2.004 (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) S2.004 will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (b) S2.004 will achieve compliance with the energy assessment requirement no later than March 21, 2014.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of S2.004 biennially as specified in 40 CFR 63.11223.
 - (b) Conduct a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include:
 - (i) A visual inspection of the boiler system;
 - (ii) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (iii) Inventory of major systems consuming energy from S2.004;
 - (iv) A review of available architectural/engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - (v) A list of major energy conservation measures;
 - (vi) A list of the energy savings potential of the energy conservation measures identified;
 - (vii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain S2.004 in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to D.4.d(1) of this section).
 - (b) Permittee must conduct a performance tune-up for S2.004 according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of S2.004 was completed.
 - (c) Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of S2.004 and its energy use systems was completed and submit upon request, the energy assessment report.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for S2.004 according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to D.4.d(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).- 5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

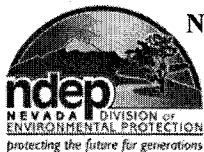
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

G. Emission Unit S2.011 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - e. 40 CFR Part 63 Subpart JJJJJ - NESHA for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.011** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.011** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (b) **S2.011** will achieve compliance with the energy assessment requirement no later than March 21, 2014.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.011** biennially as specified in 40 CFR 63.11223.
 - (b) Conduct a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include:
 - (i) A visual inspection of the boiler system;
 - (ii) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (iii) Inventory of major systems consuming energy from **S2.011**;
 - (iv) A review of available architectural/engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - (v) A list of major energy conservation measures;
 - (vi) A list of the energy savings potential of the energy conservation measures identified;
 - (vii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.011** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to G.4.d(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.011** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.011** was completed.
 - (c) Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of **S2.011** and its energy use systems was completed and submit upon request, the energy assessment report.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.011** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to G.4.d(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).- 5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

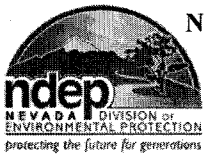
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

H. Emission Unit S2.014 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - e. 40 CFR Part 63 Subpart JJJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.014** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.014** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (b) **S2.014** will achieve compliance with the energy assessment requirement no later than March 21, 2014.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.014** biennially as specified in 40 CFR 63.11223.
 - (b) Conduct a one-time energy assessment performed by a qualified energy assessor. The energy assessment must include:
 - (i) A visual inspection of the boiler system;
 - (ii) An evaluation of operating characteristics of the facility, specifications of energy using systems, operating and maintenance procedures, and unusual operating constraints;
 - (iii) Inventory of major systems consuming energy from **S2.014**;
 - (iv) A review of available architectural/engineering plans, facility operation and maintenance procedures and logs, and fuel usage;
 - (v) A list of major energy conservation measures;
 - (vi) A list of the energy savings potential of the energy conservation measures identified;
 - (vii) A comprehensive report detailing the ways to improve efficiency, the cost of specific improvements, benefits, and the time frame for recouping those investments.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.014** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to H.4.d(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.014** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.014** was completed.
 - (c) Permittee must submit a signed certification in the Notification of Compliance Status report that an energy assessment of **S2.014** and its energy use systems was completed and submit upon request, the energy assessment report.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.014** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to H.4.d(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
 5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

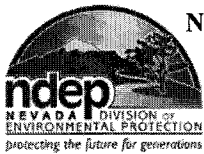
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AM. Emission Unit S2.056 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.056** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.056** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.056** biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.056** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AM.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.056** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.056** was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.056** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AM.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



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CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AN. Emission Unit S2.057 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.057** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.057** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.057** biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.057** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AN.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.057** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.057** was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.057** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AN.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



Bureau of Air Pollution Control

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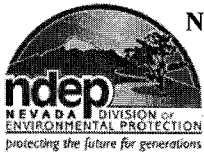
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

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Section VI. Specific Operating Conditions (continued)

AO. Emission Unit S2.058 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.058** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.058** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.058** biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.058** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AO.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.058** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.058** was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.058** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AO.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



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Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AP. Emission Unit S2.059 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.059** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.059** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.059** biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.059** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AP.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.059** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.059** was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.059** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AP.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



Bureau of Air Pollution Control

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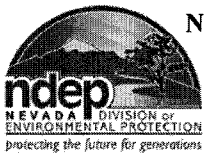
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AP. Emission Unit S2.059 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.059** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.059** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.059** biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.059** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AP.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.059** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.059** was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.059** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AP.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



Bureau of Air Pollution Control

Facility ID No. A0022

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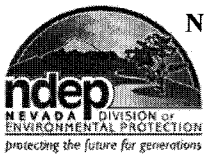
**CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS**

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AQ. Emission Unit S2.060 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for S2.060 (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) S2.060 will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of S2.060 biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain S2.060 in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AQ.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for S2.060 according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of S2.060 was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for S2.060 according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AQ.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



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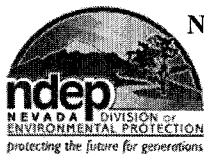
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AR. Emission Unit S2.061 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.061** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.061** will achieve compliance with the work practice or management practice standard of a tune-up no later than March 21, 2012.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.061** biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.061** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AR.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.061** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.061** was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.061** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AR.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



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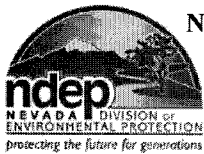
CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AS. Emission Unit S2.062 (continued)

4. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
 - b. 40 CFR Part 63 Subpart JJJJJ - NESHAP for Industrial, Commercial, and Institutional Boilers Area Sources
Permittee must comply with the following applicable requirements for **S2.062** (an existing industrial boiler at an area source of HAP emissions):
 - (1) Compliance Dates – 40 CFR 63.11196
 - (a) **S2.062** will achieve compliance with the work practice or management practice standard of a tune-up no later than **March 21, 2012**.
 - (2) Work Practice Standards - 40CFR63.11201(b), Table 2:
 - (a) Conduct a tune-up of **S2.062** biennially as specified in 40 CFR 63.11223.
 - (3) General Requirements – 40 CFR 63.1205(a):
 - (a) Permittee must operate and maintain **S2.062** in a manner consistent with safety and good air pollution control practices for minimizing emissions at all times.
 - (4) Initial Compliance Requirements – 40 CFR 63.11210(c), 40 CFR 63.11214(b) and (c):
 - (a) Permittee must demonstrate initial compliance no later than the compliance date specified in 40 CFR 63.11196 (refer to AS.4.b(1) of this section).
 - (b) Permittee must conduct a performance tune-up for **S2.062** according to 40 CFR 63.11223(b) and submit a signed statement in the Notification of Compliance Status report that a tune-up of **S2.062** was completed.
 - (5) Continuous Compliance Requirements – 40CFR 63.11223(a):
 - (a) Permittee will conduct a biennial performance tune-up for **S2.062** according to 63.11223(b) and keep records as required in 63.11225(c). Each biennial tune-up must be conducted no more than 25 months after the previous tune-up.
 - (6) Notification, Reporting, Recordkeeping Requirements – 40 CFR 63.11225:
 - (a) Permittee must submit the Notification of Compliance Status specified in 40 CFR 63.11225(a)(4) no later than 120 days after the applicable compliance date specified in 40 CFR 63.11196 (refer to AS.4.b(1) of this section).
 - (b) Permittee must prepare by March 1 of each year, and submit to the Administrator upon request, an annual compliance certification report for the previous calendar year containing the information specified in 40 CFR 63.11225(b).
 - (c) Permittee must maintain the records specified in 40 CFR 63.11225(c).
 - (d) Permittee must maintain records in a form suitable for and readily available for expeditious review as specified in 40 CFR 63.11225(d).
5. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program
No shield requested.



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Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AU. Emission Unit S2.066 Location North 4,265.62 km, East 360.76 km, UTM (NAD 83, Zone 11)

System 47 – Battery Recycling Retort

S 2.066 Lochhead-Haggerty Mercury Retort, mdl# MR-15E, Building 104-5 (Battery Recycling Facility)

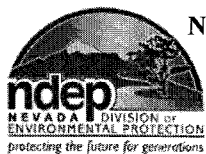
1. Air Pollution Control Equipment NAC 445B.3405 (NAC 445B.316) Part 70 Program
 - a. Emissions from S2.066 shall be ducted to a control system (ducted to a single exhaust stack) with 100% capture consisting of the following equipment:

Mercury Condenser (MC-1, operated in series with MC-2)
Mercury Condenser (MC-2, operated in series with MC-1)
Chiller (C-1)
Condensation Vessel (CV-1)
After Cooler with Mist Eliminator (AC-1)
Carbon Filter Column with Sulfur-Impregnated Carbon (CFC-1, operated in parallel with CFC-2)
Carbon Filter Column with Sulfur-Impregnated Carbon (CFC-2, operated in parallel with CFC-1)

Single Exhaust Stack Parameters
Stack Height: 16.0 feet
Stack Diameter: 1.5 inches
Stack Temperature: Maximum of 140 °F
Stack Flow Rate: 15 to 40 dry standard cubic feet per minute (dscfm)
 - b. Emissions from the retort hood vent shall be controlled in a manner which minimizes emissions.
2. Construction Requirements NAC 445B.3405 (NAC 445B.316), NAC 445B.250 Part 70 Program
 - a. The Permittee shall provide the Director written notification of the anticipated date of initial startup of S2.066, postmarked not more than 60 days and not less than 30 days prior to such date.
 - b. The Permittee shall provide the Director written notification of the actual date of initial startup of S2.066, postmarked within 15 days after such date.
 - c. Install equipment necessary to address the requirements of AU.4.f. and AU.5. of this section.
3. Emission Limits NAC 445B.3405 (NAC 445B.316) Part 70 Program

On and after the date of issuance of this permit, Permittee will not discharge or cause the discharge into the atmosphere from the single exhaust stack of S2.066, the following pollutants in excess of the following specified limits:

 - a. NAC 445B.305 Part 70 Program – The discharge of mercury to the atmosphere will not exceed 0.0048 pounds per hour (based on 0.057 pounds/batch and 12 hours/batch).
 - b. NAC 445B.305 Part 70 Program – The discharge of mercury to the atmosphere will not exceed 0.057 lbs per batch.
 - c. NAC 445B.305 Part 70 Program – The discharge of mercury to the atmosphere will not exceed 0.021 tons (41.7 pounds) per year, based on a 12-month rolling period.
 - d. NAC 445B.22017 Federally Enforceable SIP Requirement – The opacity from the single stack discharge will not equal or exceed 20% in accordance with NAC 445B.22017.



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CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AU. Emission Unit S2.066 - continued

4. Operating Parameters NAC 445B.3405 (NAC 445B.316) Part 70 Program

- a. The maximum allowable throughput rate of zinc plates from battery cells of Naval Undersea Warfare equipment for S2.066 will not exceed 2,700 zinc plates per batch, corresponding to 0.17 tons (343 pounds, total weight including 20% moisture) per batch, nor more than 125 tons per 12-month rolling period.
- b. The process time for each batch is 12 to 16 hours (temperature ramp up, soaking, and cooling).
- c. The maximum allowable batches will not exceed 730 batches per 12-month rolling period.
- d. The maximum allowable mercury content will not exceed 5.71 pounds per batch (based on 2 wt% mercury per zinc plate, dry weight), corresponding to 4,171 pounds of mercury per 12-month rolling period.

e. Hours

S2.066 may operate 24 hours per day and 8,760 hours per calendar year.

f. The following work practice standards will be followed:

- (1) S2.066 shall be operated in accordance with the manufacturer's recommendations (as referenced in the Lockheed Haggerty operation and maintenance manual) at all times during operation, including start-up and shut-down periods.
- (2) Zinc plates shall be retorted in pans specified by the retort manufacturer and not exceed the volume capacity specified by the manufacturer, per pan.
- (3) The retort furnace of S2.066 shall be maintained under negative pressure during operation. The retort heating element of the retort furnace will shut down if the gauge pressure of the retort furnace reports positive pressure.
- (4) The cooling water temperature entering MC-1 shall be maintained at or below 100 °F. The retort heating element of the retort furnace will shut down if the cooling water temperature entering MC-1 exceeds 100 °F.
- (5) The cooling water flow rate entering MC-1 shall be maintained at or above 8 gallons per minute. The retort heating element of the retort furnace will shut down if the cooling water flow rate entering MC-1 falls below 8 gallons per minute.
- (6) The exhaust gas temperature of the exhaust stack shall be maintained at or below 140 °F. The retort heating element of the retort furnace will shut down if the exhaust gas temperature exceeds 140 °F.
- (7) Condensed mercury shall be collected from CV-1 following each retort batch run.
- (8) CFC-1 and CFC-2 combined, shall contain no less than 200 pounds of sulfur-impregnated carbon.
- (9) Replace the sulfur-impregnated carbon in CFC-1 and CFC-2 according to the following schedule:
 - (a) After 3,060 hours of operation for S2.066, or
 - (b) After 3,060 hours of operation for S2.066 an analysis of the sulfur-impregnated carbon in CFC-1 and CFC-2 will be performed to determine the percentage of mercury by weight. A representative sample shall be taken and analyzed. The depth of the sample location shall be recorded. Using this sample the percentage of mercury by weight shall be calculated. Sampling will be conducted for every 1,000 hours of operation for S2.066, at the same sample depth location, until reaching 14% by weight of the carbon. Upon reaching 14% by weight of the carbon, sampling of the carbon will occur every 500 hours of operation for S2.066 until 15% by weight of the carbon is reached. The carbon will be replaced with an equivalent performing sulfur impregnated carbon no later than 30 days after reaching 15% by weight of the carbon. The required mercury analysis shall be performed utilizing one of the following methods:
 - (i) EPA method 6020-Inductively Coupled Plasma-Mass Spectrometry;
 - (ii) EPA method 7471B- Mercury in Solid or Semisolid Waste (Manual Cold-Vapor Technique);
 - (iii) An alternative test method as approved in advance by the Director.



Bureau of Air Pollution Control

Facility ID No. A0022

Draft Permit No. AP9711-0863.02

CLASS I AIR QUALITY OPERATING PERMIT
SPECIFIC OPERATING REQUIREMENTS

Issued to: Department of the Army, Hawthorne Army Depot (HWAD)

Section VI. Specific Operating Conditions (continued)

AU. Emission Unit S2.066 - continued

5. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program

a. Monitoring

Permittee, upon the issuance date of this permit, will:

- (1) Monitor the hours of operation of S2.066 on a daily basis when operated.
- (2) Monitor the number of zinc plates and batch weight of zinc plates in tons for each batch loaded to S2.066 on a daily basis when operated.
- (3) Monitor the gauge pressure for the retort furnace during operation of S2.066, in inches of mercury.
- (4) Monitor the cooling water temperature entering MC-1 during operation of S2.066, in degrees Fahrenheit.
- (5) Monitor the cooling water flow rate entering MC-1 during operation of S2.066, in gallons per minute.
- (6) Monitor the exhaust gas temperature of the exhaust stack during operation of S2.066, in degrees Fahrenheit.
- (7) Monitor the mercury drained from CV-1 for each batch, in pounds.
- (8) Monitor the change-out of the sulfur-impregnated carbon for CFC-1 and CFC-2 and the analysis (if performed) of the percentage of mercury by weight for the sulfur-impregnated carbon, as required in AU.4.f(9)(b) of this section until reaching 15 percent capacity.
- (9) Monitor any events that result in an interlock shut-down, or other system upsets of S2.066 and any corrective actions taken.

b. Recordkeeping

The required monitoring and recordkeeping established in (1) through (9) above will be maintained in a contemporaneous log containing, at a minimum, the following:

- (1) The calendar date of any required monitoring.
- (2) The total daily hours of operation for each batch, for the corresponding date.
- (3) The total number of zinc plates and batch weight of zinc cells in tons for each batch loaded to S2.066, for the corresponding date.
- (4) The monthly throughput rate of zinc plates in batches per calendar month, and the corresponding annual throughput rate of zinc plates in batches per 12-month rolling period.
- (5) The gauge pressure for the retort furnace, based on real-time measurements from a data logger, for the corresponding date.
- (6) The cooling water temperature entering MC-1, based on real-time measurements from a data logger, for the corresponding date.
- (7) The cooling water flow rate entering MC-1 during operation of S2.066, based on real-time measurements from a data logger, for the corresponding date.
- (8) The exhaust gas temperature of the exhaust stack, based on real-time measurements from a data logger, for the corresponding date.
- (9) The amount of mercury collected from CV-1 for each batch, for the corresponding date.
- (10) The monthly amount of mercury collected from CV-1 per calendar month, and the corresponding annual amount of mercury collected from CV-1 per 12-month rolling period.
- (11) The date, time, and weight of each sulfur-impregnated carbon replacement for CFC-1 and CFC-2.
- (12) The original manufacturer's design specifications for the sulfur impregnated carbon used in CFC-1 and CFC-2 shall be kept on site.
- (13) If a mercury analyses is performed on the sulfur-impregnated carbon for CFC-1 and CFC-2 then record:
 - (a) The percentage of mercury by weight in the sulfur-impregnated carbon.
 - (b) The depth of the sample location, for each carbon column.
- (14) The date, time, and corrective action taken for an interlock shut-down, or other system upsets for the corresponding date.



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Section VI. Specific Operating Conditions (continued)

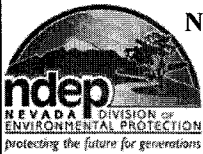
AU. Emission Unit S2.066 - continued

5. Monitoring, Recordkeeping, Reporting, and Compliance NAC 445B.3405 (NAC 445B.316) Part 70 Program (continued)
- c. Performance and Compliance Testing (NAC 445B.3405)(NAC 445B.315) Part 70 Program
 - (1) Test Methods and Procedures

The Permittee must conduct periodic tests of performance or compliance on the exhaust stack of S2.066 to comply with the emission limitation in AU.3. of this section. All performance or compliance tests must comply with the advance notification, protocol approval, operational conditions, reporting, and other requirements of Section I.S. Testing and Sampling (NAC 445B.252) of this Operating Permit.
 - (2) Within 180 days of the notification of initial startup of S2.066 as required in AU.2.b of this section, and within 90 days prior to the date of expiration of this permit, but no earlier than 365 days from the date of expiration of this permit, the Permittee shall conduct and record a performance test for mercury on the exhaust stack of S2.066:
 - (a) Conduct and record a US EPA Method 29 of 40 CFR Part 60 compliance test for mercury on the single exhaust stack (post controls). Each of the three test runs must collect a sample volume of 1.7 dry standard cubic meters (60 dscf) or be conducted for up to two hours in an effort to collect this sample volume. The first test run will be conducted during the retort temperature ramp up period. The second test run will be conducted during the end of the temperature ramp up period and beginning of maximum temperature period. The third test run will be conducted during the soak period at maximum temperature. The test runs shall be conducted on a batch of zinc plates from battery cells of Naval Undersea Warfare equipment that have the highest level of mercury content.
 - (b) Performance tests required under this section that are conducted below the maximum allowable throughput, as established in AU.4.a and AU.4.b of this section, shall be subject to the director's review to determine if the throughputs during the performance tests were sufficient to provide adequate compliance demonstration. Should the director determine that the performance tests do not provide adequate compliance demonstration; the director may require additional performance testing.
6. Reporting (NAC 445B.3405)(NAC 445B.316) Part 70 Program
 - a. Submit yearly reports as required in Section V.D. of this Operating Permit;
 - b. Report all excess emissions as required in Sections III.B. and III.C of this Operating Permit;
 - c. Report any deviation from the operating requirements for S2.066, as required in Section V.C. of this Operating Permit;
 - d. Submit semi-annual monitoring reports as required in Section V.C. of this Operating Permit; and
 - e. Annual Compliance Certification - Certify compliance with all applicable requirements as required in Section V.E. of this operating permit.
7. Shielded Requirements NAC 445B.3405 (NAC 445B.316) Part 70 Program

No shield requested.

*****End of Specific Operating Conditions*****



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CLASS I AIR QUALITY OPERATING PERMIT
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Section X. Amendments

December 29, 2011 – This permit includes several actions by request of Permittee:

- Operating Permit to Construct AP9711-1445 transfer to Class I Air Permit AP9711-0863.01, case# 08AP0132, application submitted 11/07/07.
- Revision to Operating Permit to Construct AP9711-1445, case# 09AP0151, application submitted 11/17/08
- Renewal of Class I Air Permit AP9711-0863.01, case# 09AP0150, application submitted 11/17/08.
- Significant Revision of Class I Air Permit AP9711-0863.01, case# 11AP0124, application submitted 9/24/10.

The four application documents submitted to NBAPC will result in a single Title V Operating Permit that includes the following:

- Renewed and Revised Main Base Air Permit for HWAD.
- RF-9 included in the HWAD Main Base operating permit (no longer an OPTC).
- RF-9 operating hours increased to 4,660 hours per year.
- PODS cooling tower added to the emissions inventory as an insignificant source.
- RF-9 and PODS emissions reflecting compliance with April 2008 MACT standards.
- Removal of two boilers no longer in service (S2.005 & S2.007).
- Removal of radial stacker damaged beyond repair and removed from site (PF1.016).
- Removal of emergency generator (Cummins Generator, Serial #J920487824, permit IDEG-004) and replacement with a similar Katolight generator.
- Removal of surface coating booth (S2.042), removed from facility.
- Revision of lead emissions for Hot Gas Decontamination System (S2.044).
- Inclusion of a new surface coating booth operating 8760 hours per year.
- Inclusion of an abrasive blaster (Pangborn Blast Booth, Model LK-4, Serial 6LK4-711).
- Inclusion of used oil heater as an insignificant unit, less than 4 MMBtu.
- Boilers (units S2.001/002/003/004/011/014) restricted to 1,500,000 gal/yr fuel cap.
- Permit three gasoline dispensing storage tanks, restricted to a 10,000 gal/month.
- Old Bomb restricted to 1,000 lb/open burn/pan, and 20,000 lb/day total, and 3,900,000 lb/calendar year total.
- Facility-wide HAPs will not exceed 10 tons/yr of any one HAP or 25 tons/yr total HAPs.
- Specifically, the following caps are in place; facility-wide total HAPs cap is 24.9 ton/yr and the facility-wide HCl cap is 9.9 ton/yr.
- Old Bomb will not exceed 9.07 tons/yr of any individual HAP or 18.07 tons/yr total HAPs (these caps fall under the facility-wide cap).
- Remove lead emission limits and lead emission testing requirement for the boilers.
- Remove Schedule of Compliance for Chemical Accident Prevention Provisions – RMP submitted July 2009 to Region 9 EPA.
- Remove Schedule of Compliance for "Plan for Reduction of Emissions" – Plan submitted to NBAPC April 2011.

XX XX, 2012 – Add new battery recycling retort (System 47); air case # 12AP0164. Fix typographical errors for Systems 2-3-4-7-8-39-40-41-42-43-44-45.

This permit:

1. Is non-transferable. (NAC 445B.287.4) Part 70 Program
2. Will be posted conspicuously at or near the stationary source. (NAC 445B.318) State Only Requirement
3. Will expire and be subject to renewal five (5) years after the issuance date of July 16, 2009. (NAC 445B.315 and NAC 445B.3443.1) Part 70 Program
4. A completed application for renewal of an operating permit must be submitted to the director on the form provided by him with the appropriate fee at least 240 calendar days before the expiration date of this operating permit. NAC 445B.3443.2 Part 70 Program
5. Any party aggrieved by the Department's decision to issue this permit may appeal to the State Environmental Commission (SEC) within ten days after the date of notice of the Department's action. (NRS 445B.340) State Only Requirement

THIS PERMIT EXPIRES ON:

July 16, 2014

Signature _____
Draft Copy

Issued by: Jeffrey Kinder, P.E.
Supervisor, Permitting Branch
Bureau of Air Pollution Control

Phone: (775) 687-9475

Date: _____